

October 4, 2024

By ECF

The Honorable Dale E. Ho  
United States District Judge  
U.S. District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. M/Y Amadea, No. 23-cv-9304 (DEH)

Dear Judge Ho:

Pursuant to the Court's order (ECF No. 258), the parties submit this joint letter regarding the location of Khudainatov's deposition and the depositions referenced in the parties' filings at ECF Nos. 241 and 252. The Government has now received responses from the two countries identified in previous correspondence as acceptable to both parties. One country has denied the request for the deposition to proceed there. The other country has indicated that an MLA request would be required, and that any questioning would need to be conducted by a local prosecutor if the request were granted. Given this recent news, the parties propose that they take one more week to see whether they can come to a mutually-agreeable deposition location, and that they provide a further status update to the Court by October 11.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney  
Southern District of New York

By: /s/ Dominika Tarczynska  
JENNIFER JUDE  
DOMINIKA TARCZYNSKA  
RACHAEL DOUD  
Assistant United States Attorneys

MARGARET A. MOESER  
Chief  
Money Laundering and Asset Recovery  
Section, Criminal Division  
U.S. Department of Justice

By: /s/ D. Hunter Smith  
JOSHUA L. SOHN  
D. HUNTER SMITH  
Trial Attorneys  
Money Laundering and Asset Recovery  
Section

JENNIFER KENNEDY GELLIE  
Executive Deputy Chief  
Counterintelligence and Export Control  
Section, National Security Division  
U.S. Department of Justice

By: /s/ Yifei Zheng  
YIFEI ZHENG  
Trial Attorney  
Counterintelligence and Export Control  
Section

/s/ Adam C. Ford  
Adam C. Ford  
Renee Jarusinsky  
Robert Landy  
Ford O'Brien Landy LLP

Counsel for Claimants Eduard Yurievich  
Khudainatov and Millemarin Investments Ltd.